

## PIERRE PIERRE LAW, P.C.

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October 18, 2021

Plaintiff's letter-motion requesting an extension of the social security briefing schedule (ECF No. 16) is GRANTED, and the proposed deadlines are ADOPTED.

The Clerk of Court is respectfully directed to close ECF No. 16.

SO ORDERED 10/19/2021

  
SARAH L. CAVE  
United States Magistrate Judge

Honorable Sarah L. Cave  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Courtroom 18A  
New York, NY 10007

**Letter Motion:  
Extension of Time Request**

**Re: Mauro Reyes v. Comm'r of SSA 1:21-cv-00707-JMF-SLC**

Dear Honorable Judge Cave:

Pursuant to the Scheduling Order in the above referenced case, Plaintiff's Motion for Judgment on the Pleadings is due on October 19, 2021. Due to the many Certified Administrative Records ("CAR") filed by the Defendant as he recovers from the pandemic backlog, Plaintiff's counsel has incurred several conflicts on the briefing calendar and requires additional time to prepare his brief in this matter. For example, Plaintiff has 26 motions due in the month of October as a result of the sudden influx of CAR filings. Plaintiff therefore writes to respectfully request an extension of time of sixty days (60), with the following proposed revised Scheduling Order:

- a) Plaintiff to serve her motion on or before December 20, 2021;
- b) Defendant to serve her cross motion on or before February 18, 2022;
- c) Plaintiff to serve her Reply, if any, on or before March 11, 2022.

No previous request for an extension has been made in this case and the Defendant has given consent. Thank you in advance for the Court's consideration of this request.

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Respectfully Submitted,

/s/Eddy Pierre Pierre

Eddy Pierre Pierre, Esq.

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Cc: Mary Ellen Brennan, Esq. (Via ECF)  
Attorney for Defendant.